

JAMES P. KEMP, ESQ.  
Nevada Bar No.: 6375  
VICTORIA L. NEAL, ESQ.  
Nevada Bar No.: 13382  
KEMP & KEMP  
7435 W. Azure Drive, Ste 110  
Las Vegas, NV 89130  
702-258-1183 ph/702-258-6983 fax  
jp@kemp-attorneys.com  
vneal@kemp-attorneys.com

*Attorneys for Plaintiff*  
*Jorge Rosales*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

\*\*\*

JORGE ROSALES,

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada corporation;

Defendant.

)  
) Case No.: 2:17-cv-03117-JCM-GWF  
)  
) **STIPULATION AND [PROPOSED]**  
) **ORDER FOR EXTENSION OF TIME**  
) **FOR PLAINTIFF TO RESPOND TO**  
) **DEFENDANT’S MOTION FOR**  
) **SUMMARY JUDGEMENT AT ECF NO.**  
) **20**  
)  
) **[FIRST REQUEST]**

Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 7-1, Plaintiff JORGE ROSALES (“Plaintiff”), by and through his undersigned counsel, James P. Kemp, Esq. and Victoria L. Neal, Esq., of the law firm of Kemp & Kemp, and Defendant BELLAGIO (“Defendant”), by and through its undersigned counsel, Deverie J. Christensen, Esq. and Phillip C. Thompson of the law firm of Jackson Lewis P.C., hereby stipulate, subject to approval by the Court, to extend the time for Plaintiff to respond to Defendant’s Motion For Summary Judgment at ECF No. 20. This is the first request for an extension of time for Plaintiff to respond to Defendant’s Motion for Summary Judgement. This request is sought in good faith and not for purposes of undue delay.

1           **I.       RELEVANT FACTS**

2           Discovery in this matter closed September 21, 2018 after two previous extensions were  
3 requested and granted due to the scheduling of depositions and the parties not having transcripts  
4 necessary to proceed with preparing dispositive motions. **ECF Nos. 17 and 19.** The current  
5 dispositive motion deadline was October 22, 2018, with responses due November 12, 2018  
6 (Veteran's Day).  
7

8           **II.     REASON FOR REQUEST**

9           The extension is necessary because of Plaintiff's counsels' extremely heavy workload.  
10 This includes, but it not limited to, an opening brief for the Ninth Circuit Court of Appeals, an  
11 opening brief for the Nevada Supreme Court, preparation for and conducting nine depositions  
12 (three out of state) including 30(b)(6) witnesses, defending two depositions, preparation for and  
13 attending four worker's compensation hearings, preparation for and attending an unemployment  
14 hearing, preparation for and attending an Early Neutral Evaluation conference, and an opposition  
15 to a summary judgement motion in another matter. This does not include Plaintiff's counsel's  
16 conducting their normal course of business including meeting with clients and potential clients,  
17 meet and confers with opposing counsel, witness and expert interviews, and answering and  
18 propounding formal discovery requests. In addition, there was one holiday (Nevada Day) and  
19 two more holidays (Veteran's Day and Thanksgiving) within now the requested extension time.  
20  
21  
22  
23  
24  
25  
26  
27  
28

Therefore, the parties agree that an extension of time is appropriate and stipulate that Plaintiff have up to and including November 26, 2018, in which to respond to Defendant's motion for summary judgment.

Respectfully submitted,

Dated this 7<sup>th</sup> day of November, 2018.

KEMP & KEMP

JACKSON LEWIS P.C.

/s/ Victoria L. Neal  
James P. Kemp Bar, No. 6375  
Victoria L. Neal, Bar No. 13382  
7435 W. Azure Dr., Ste. 110  
Las Vegas, Nevada 89130

/s/ Phillip C. Thompson  
Deverie J. Christensen, Bar No. 6596  
Phillip C. Thompson, Bar No. 12114  
3800 Howard Hughes Parkway, Ste. 600  
Las Vegas, Nevada 89169

*Attorneys for Plaintiff*  
*Jorge Rosales*

*Attorneys for Defendant*  
*Bellagio, LLC*

**ORDER**

**IT IS SO ORDERED:**

Dated: November 7, 2018

*James C. Mahan*  
UNITED STATES DISTRICT COURT